



GUOCOVSKI ROZENSHTEYN, PLLC

140 BROADWAY, SUITE 4067  
NEW YORK, NY 10005  
WWW.GR-FIRM.COM

JOINT	MENT
IRONICALLY FILED	
4/23/2024	
FILED:	ADRIAN GUOCOVSKI, ESQ.
TEL: (212) 884-4230	
EMAIL: ADRIAN@GR-FIRM.COM	

April 22, 2024

Via ECF

The Honorable Colleen McMahon  
United States District Court Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2550  
New York, New York 10007-1312

*Colleen McMahon*  
4/23/2024

**Re: Beasley v. fuboTV, Inc., No. 1:24-cv-00711 (CM) (RWL):  
Request for 45-Day Stay of All Case Deadlines and Adjournment of  
May 2, 2024 Pretrial Conference**

Dear Judge McMahon:

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Local Rule 7.1(d), and Section V(H) of the Court's Individual Practices and Procedures, Plaintiff Catherine Beasley ("Plaintiff") and Defendant FuboTV, Inc. ("Defendant") (jointly, the "Parties"), seek a 45-day stay of all case deadlines, through and including June 6, 2024, and adjourning the pretrial conference scheduled for May 2, 2024 at 10:00 am following the termination of the 45-day period.

The Parties respectfully request this stay while they explore the possibility of a resolution of this matter. The Parties believe that judicial economy and the interests of the Parties would be served by a stay of the action while the Parties pursue resolution. Prior to the expiration of the stay, the Parties will jointly file a status report to inform the Court of their progress and propose a briefing schedule with the timing of Plaintiff's opposition to Defendant's Motion to Compel Individual Arbitration (ECF 11) and Defendant's reply.

The Court has not yet issued a scheduling order, and this requested 45-day stay of all case deadlines, including Plaintiff's April 22 deadline to respond to Defendant's Motion to Compel Individual Arbitration and Defendant's April 29 deadline to file its reply in support of that same Motion, does not affect any other dates.

Respectfully submitted,

/s/ Adrian Gucovski  
Adrian Gucovski  
Gucovski Rozenshteyn, PLLC



140 Broadway, Suite 4667  
New York, NY 10005  
Tel: (212) 884-4230  
adrian@gr-firm.com  
Counsel for Plaintiff

CC: All Counsel of Record (Via ECF)